

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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CANDICE MCCRARY,

Plaintiff,

No. 1:24-cv-8054-MKV

v.

SEAN COMBS, DADDY'S HOUSE RECORDINGS INC.,
CE OPCO, LLC d/b/a COMBS GLOBAL f/k/a
COMBS ENTERPRISES LLC, BAD BOY
ENTERTAINMENT HOLDINGS, INC.,
BAD BOY PRODUCTIONS HOLDINGS, INC.,
BAD BOY BOOKS HOLDINGS, INC., BAD BOY
RECORDS LLC, BAD BOY ENTERTAINMENT LLC,
BAD BOY PRODUCTIONS LLC, MARRIOTT
INTERNATIONAL, INC and ORGANIZATIONAL DOES 1-10.

Defendants.

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AFFIDAVIT OF ANTHONY G. BUZBEE

IN SUPPORT OF MOTION FOR ADMISSION PRO HAC VICE

STATE OF TEXAS

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COUNTY OF HARRIS

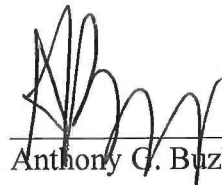
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Before me, the undersigned notary, on this day personally appeared Anthony Buzbee, a person whose identity is known to me. After I administered an oath to the affiant, he testified as follows:

1. "My name is Anthony Buzbee. I am over 21 years old, of sound mind, and capable of making this affidavit. The facts stated in this affidavit are within my personal knowledge and are true and correct.

2. I am an attorney duly licensed and in good standing in the State of New York, the State of Texas, and the United States District Court for the Eastern District of New York. I am the principal of The Buzbee Law Firm in Houston, Texas, and have more than two decades of litigation and trial experience in courts around the country. I submit this Affidavit in support of my application to be admitted *pro hac vice* in this Court.
3. Certificates of my good standing in the states of Texas and New York, as well as in the Eastern District of New York, are attached hereto as Exhibits A, B, and C, respectively.
4. I have never been convicted of a felony.
5. I have never been censured, suspended, or disbarred. I recently was denied admission to the Southern District of New York following the filing of a grievance against me by counsel for one of the defendants in an action in which I was counsel. A copy of the Southern District of New York's letter denying my application for admission is attached hereto as Exhibit D. I did not know that a grievance had been filed against me until after my admission to the Southern District of New York was denied.
6. As noted above, a grievance has been filed against me with the New York state bar by an attorney for a defendant in another action in which I was counsel for the plaintiff. Although I understand that no decision has yet been reached as to the grievance that has been filed, it is also my understanding that the filing of a grievance is a "disciplinary action" under the rules of the Southern District of New York. I have never previously been the subject of any disciplinary proceedings.
7. I intend to defend myself against the grievance as well as seek an appeal of the admissions decision reached by the Southern District of New York. The primary factor underlying both the grievance and the Southern District's admission decision is that I electronically signed numerous pleadings alongside my firm's local counsel (who is admitted to the Southern District of New York and who actually filed all pleadings and other papers). To the extent I violated the Southern District's rules in so doing, those violations were inadvertent, and I sincerely apologize. I intend to explain as much to the Southern District's admissions committee and will make certain such never occurs again. As an aside, included in the grievance, although I'm unclear whether it is a basis for such, was information regarding the filing of a lawsuit against me by a former client. That case, once it achieved a headline, was immediately dismissed, and the bases for that filing were completely fictional, all of which will be demonstrated by evidence to be presented to the grievance and admissions committees.

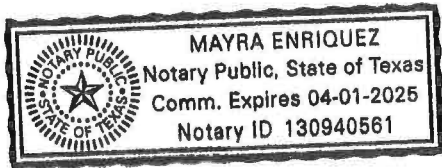
Further affiant sayeth not.



Anthony G. Buzbee

Dated: February 20, 2025

SWORN TO AND SUBSCRIBED BEFORE ME, the undersigned authority, on this the
21 day of February 2025, to certify which witness my hand and seal of office.




Notary Public, State of Texas

My Comm. Exp.: 04-01-2025